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INDICTMENT

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.- : S1 07 Cr.

RAJ MEHTA, :

Defendant.

COUNTS ONE THROUGH FOUR

The Grand Jury charges:

From in or about March 2003 through in or about October 2003, in the Southern District of New York and elsewhere, RAJ MEHTA, the defendant, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, to wit, MEHTA, a bond trader employed by KBC Financial Products, Inc., executed a fraudulent scheme through sending requests for broker quotes through electronic mail communications, receiving responsive electronic mail communications, and altering said electronic mail communications in order to create an inflated market value for his trading positions during the internal pricechecking processes of KBC Financial Products, Inc., and in so doing: (a) attempted to secure a larger monetary bonus, constituting money and property of his employer, for himself, and (b) deprived his employer of the intangible right to MEHTA's

honest services, and for the purpose of executing such scheme and artifice and attempting so to do, did transmit and cause to be transmitted by means of wire, radio and television communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, to wit, MEHTA caused the interstate electronic communications set forth below, among others, to occur:

COUNT	APPROXIMATE DATE	Nature of Electronic Mail Communication
ONE	April 30, 2003	Email from JP Morgan Broker regarding Ford 7.45 Security
TWO	May 30, 2003	Email from JP Morgan Broker regarding Ford 7.45 Security
THREE	June 30, 2003	Email from Goldman Sachs broker regarding AAPL Security
FOUR	September 4, 2003	Email from JP Morgan Broker regarding CNAFNL Security

(Title 18, United States Code, Sections 1343 and 1346.)

FOREPERSON

United States Attorney

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RAJ MEHTA,

Defendant.

INDICTMENT

S1 07 Cr.

(18 U.S.C. §§ 1343 & 1346)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Johnson J

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